



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA**

UNITED STATES OF AMERICA,	)	MOTION FOR REDUCTION IN
	)	SENTENCE PURSUANT TO
PLAINTIFF,	)	AMENDMENT 821
	)	
NEDELTCO VLADIMROV,	)	CASE NO. 2:20-CR-00054-01
	)	
DEFENDANT.	)	JUDGE _____

NOW COMES Defendant Nedeltcho Vladimrov ("Mr. Vladimrov"), Pro Se, and respectfully moves this Honorable Court, pursuant to 18 U.S.C. §3582(c)(2) and §1B1.10 of the Sentencing Guidelines, to reduce his sentence based on Amendment 821 to create a new Chapter Four guideline at §4C1.1 (Adjustment for Certain Zero-Point Offenders), which became effective November 1, 2023.

In support of this Motion, Mr. Vladimrov hereby states as follows:

1. On January 20, 2022, Mr. Vladimrov was sentenced to a term of imprisonment of 97 months by this Court on one count of conspiracy in money laundering in violation of 18 U.S.C. §1956(h) and three counts of money laundering in violation of 18 U.S.C. 1957(a).

2. After a finding of guilt by the jury, the Presentence Report, as adopted by this Court in the judgment entered in this action, the applicable offense level was 30, Category I.

3. Effective November 1, 2023, §4C1.1 of the Sentencing Guidelines was created to provide a decrease of two levels from the offense level determined under Chapters Two and Three for offenders who did not receive any criminal history points under Chapter Four, Part A and whose offense did not involve specified aggravating factors.

4. As established under §1B1.10 of the Sentencing Guidelines, this amendment is to be applied retroactively.

5. When Mr. Vladimrov's base offense level is recalculated in accordance with the language of the amendment, the offense level goes from 30 to 28.

6. Therefore, Mr. Vladimrov is entitled to be resentenced under the retroactively applied amendment.

7. No other factors are present justifying any other change in the computation of Mr. Vladimrov's offense levels.

8. Mr. Vladimrov's criminal history computation remains a Category I as computed in the Presentence Report.

9. The appropriate guideline range for an Offense Level 28 with a Criminal History Category of I is 78-97 months.

10. At Mr. Vladimrov's sentencing on January 20, 2022, this Court imposed the low end of the guideline range.

11. If this Court maintains its position and imposes the low end of the new range (78 months), Mr. Vladimrov believes that his release date would be in or around September of 2025.

12. Mr. Vladimrov has maintained a discipline-free institution record and continues to program despite the lengthy current waiting list to enroll in programs at his federal correction facility.

WHEREFORE, based on the foregoing arguments and authorities, Defendant Nedeltcho Vladimrov respectfully asks this Court to reduce his sentence and enter a new Judgment in a Criminal Case reflecting said change in Defendant's sentence, and any other further relief which this Court deems just and fair.

Respectfully Submitted,



Nedeltcho Vladimrov

CERTIFICATE OF SERVICE

I, Nedeltcho Vladimrov, hereby certify that a true and accurate copy of the foregoing was sent on this 1<sup>st</sup> day of NOVEMBER, 2023:

Clerk of Courts  
Robert C. Byrd U.S. Courthouse  
300 Virginia St. East, Suite 2400  
Charleston, WV 25301